

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

WILLIAM WHITFORD, et al.

Plaintiffs,

v.

Case No. 3:15-CV-00421-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY,

Intervenor-Defendant.

THE WISCONSIN ASSEMBLY DEMOCRATIC
CAMPAIGN COMMITTEE,

Plaintiff,

v.

Case No. 3:18-CV-00763-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY,

Intervenor-Defendant.

**THE WISCONSIN STATE ASSEMBLY'S UNOPPOSED MOTION FOR
AN EXTENSION OF TIME TO FILE ITS REPLY BRIEF IN SUPPORT
OF THE ASSEMBLY'S MOTIONS TO DISMISS**

The Wisconsin State Assembly, through its attorneys, hereby moves for an extension of the deadline to file its reply brief in support of the Assembly's motions to dismiss (*Whitford* ECF No. 224; *ADCC* ECF No. 27) until after the Court rules on the Assembly's pending Emergency Motion to Stay (*Whitford* ECF No. 230; *ADCC* ECF No. 32).

For the reasons stated in the Assembly's Emergency Motion to Stay, a stay of this matter is warranted in light of the Supreme Court's pending resolution of *Common Cause* and *Benisek*. Extending the Assembly's reply brief deadline until after this Court evaluates the Assembly's motion to stay is likewise warranted to avoid wasting the Court's and the Assembly's time and resources.

Accordingly, the Assembly respectfully requests that the Court issue an order postponing the deadline for the Assembly to file its reply brief until after the Court has ruled on the Assembly's Motion to Stay. In the event the Court denies the Motion to Stay, the Assembly requests that the Court order the reply brief due one week from its denial of the Motion to Stay.

Counsel for plaintiffs have advised that they do not oppose this motion, "provided it does not delay the discovery and trial dates and deadlines set by the Court." Postponing the Assembly's reply brief will not affect these other dates.

Counsel for defendants have advised that they do not oppose this motion.

Respectfully submitted this 7th day of January 2019.

BARTLIT BECK LLP

/s/ Adam K. Mortara
Adam K. Mortara, SBN 1038391
Joshua P. Ackerman
54 W. Hubbard Street
Chicago, IL 60654
Ph. 312-494-4400
Fax 312-494-4440
adam.mortara@bartlitbeck.com
joshua.ackerman@bartlitbeck.com

BELL GIFTOS ST. JOHN LLC

/s/ Kevin St. John
Kevin St. John, SBN 1054815
5325 Wall Street, Suite 2200
Madison, WI 53718-7980
Ph. 608-216-7990
Fax 608-216-7999
kstjohn@bellgiftos.com

Attorneys for Wisconsin State Assembly